

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

UNITED STATES OF AMERICA

v.

ROBERT HANKARD

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Criminal No. CCB-20-17

CONSENT MOTION TO MODIFY ORDER SETTING CONDITIONS OF RELEASE

The Defendant, Robert Hankard, through counsel, Jonathan P. Van Hoven, hereby requests that the current Order Setting Conditions of Release be modified, and in support of this request, respectfully represents the following:

1. On or about January 15, 2029, this Honorable Court issued an Order Setting Conditions of Release.
2. The Order currently restricts the Defendant's travel to Maryland
3. Counsel has conferred with U.S. Pretrial Services and has verified that the Defendant has been in full compliance with all conditions of his release and currently works as an Uber driver.
4. The Defendant is respectfully requesting that the Court modify the conditions of release in order to be permitted to pick up and drop off his Uber ride share passengers in the surrounding States of Virginia, Delaware, Pennsylvania as well as the District of Columbia.
5. Counsel has furthermore conferred with Leo Wise, Esq., who has stated that the Government is not opposed to this request.
6. Counsel has also conferred with U.S. Pretrial Officer Jessica Weisman who also does not object to this request.

WHEREFORE, the Defendant respectfully requests that this Honorable Court:

A. Modify the conditions of release in order to allow for the Defendant pick up and drop off his Uber ride share passengers in the surrounding States of Virginia, Delaware, Pennsylvania as well as the District of Columbia.

B. Grant such further relief as the nature of this request may require.

Respectfully submitted,
/s/

Jonathan P. Van Hoven
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of February, 2020, the foregoing Consent Motion To Modify Order Setting Conditions of Release was filed via ECF.

/s/

Jonathan P. Van Hoven